

**UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION**

**BEFORE THE ATOMIC SAFETY AND LICENSING BOARD PANEL**

---

**In the Matter of  
South Texas Project Nuclear Operating Co.  
Application for the South Texas Project  
Units 3 and 4  
Combined Operating License**

**Docket Nos. 52-012, 52-013  
August 21, 2013**

---

**INTERVENORS' MOTION FOR PROPOSED CROSS-EXAMINATION**

Pursuant to the Amended Scheduling Order dated June 11, 2013, Intervenors hereby move to have Applicant witnesses Mark A. McBurnett, Samuel J. Collins, and Robert S. Wood answer the proposed cross-examination questions. The proposed cross-examination questions and examination plans have been submitted to this ASLB Panel *in camera*.

Respectfully submitted,

/s/ Brett A. Jarmer \_\_\_\_\_  
Robert V. Eye, Kan. Sup. Ct. No.10689  
Brett A. Jarmer, Kan. Sup. Ct. No. 23283  
Kauffman & Eye  
123 SE 6th Ave., Suite 200  
Topeka, Kansas 66603  
785-234-4040  
bob@kauffmaneye.com  
brett@kauffmaneye.com

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

**BEFORE THE ATOMIC SAFETY AND LICENSING BOARD PANEL**

---

**In the Matter of  
South Texas Project Nuclear Operating Co.  
Application for the South Texas Project  
Units 3 and 4  
Combined Operating License**

**Docket Nos. 52-012, 52-013**

---

**CERTIFICATE OF SERVICE**

I hereby certify that on August 21, 2013 a copy of “Intervenors’ Motion for Proposed Cross Examination” was served by the Electronic Information Exchange.

*Signed (electronically) by Brett A. Jarmer*  
Brett A. Jarmer  
Counsel for the Petitioners  
Kauffman & Eye  
123 SE 6<sup>th</sup> Ave., Suite 200  
Topeka, KS 66603  
E-mail: [brett@kauffmaneye.com](mailto:brett@kauffmaneye.com)